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Sunkist Growers, Inc.
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United Fresh Fruit &
Vegetable Association

August 16, 2005

Mr. Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMP-NOP
1400 Independence Avenue, SW
Room 4008-So., Ag Stop 0268
Washington, DC 20250

RE: Docket No. TM-04-07; National Organic Program, Sunset Review

The United Fresh Fruit and Vegetable Association (United) is providing these comments to the U.S. Department of Agriculture's (USDA) advance notice of proposed rulemaking regarding the expiration on October 21, 2007 of the allowed use of 165 synthetic and non-synthetic substances in organic food production and handling. 70 Federal Register 35177 (June 17, 2005).

United is a national trade organization representing the fresh produce industry. Our members include growers, shippers and marketers in almost every state in the nation, as well as a broad cross section of state, regional and commodity groups representing produce growers across the country.

As part of our comments, United strongly supports the renewal of ethylene, chlorine materials, and ascorbic acid on the National List for use on the organic production and postharvest handling of fruits and vegetables. These products are an essential material used on all commercial fruits and vegetables – both conventional and organic produce – to provide uniform ripening, sanitation applications, and preservation of the fruit or vegetable prior to their display in the marketplace. All of these products are critical for quality enhancements and consumer acceptance of fresh fruits and vegetables.

United appreciates the consideration of these comments by the National Organic Standards Board and USDA in support of the continued allowance ethylene, ascorbic acid, and chlorine for organic production and postharvest handling of fruits and vegetables labeled as “organic.”

Please contact me directly at (202) 303- 3400 for any questions or discussion on these comments.

Sincerely,

Robert Guenther
Vice President, Public Policy

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